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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

IN RE:

RICK SIMMONS,

Debtor.

Bankruptcy No. 14-31041

Chapter 13

Honorable William T. Thurman

OBJECTION TO MOTION OF FEDERAL NATIONAL MORTGAGE ASSOCIATION
("FANNY MAE") FOR TERMINATION OF THE AUTOMATIC STAY AND CO-DEBTOR
STAY

The Debtor, Rick Simmons, by and through Counsel, Stephen M. Enderton, hereby objects to the Motion of Federal National Mortgage Association ("Fanny Mae") for Termination of the Automatic Stay and Co-debtor Stay and as grounds states as follows:

The Debtor is delinquent and is willing to enter into an agreed order in which he will pay \$10,000.00 down and the balance over a reasonable period of time. Additionally, there is equity in the property and the property is necessary for an effective reorganization.

Therefore, the Debtor prays that the Court sustain his objection to the Motion of Federal National Mortgage Association ("Fanny Mae") for Termination of the Automatic Stay and Co-debtor Stay.

Dated this 24th day of August, 2015.

/s/

Stephen M. Enderton, of and for
ENDERTON & MATHEWS, LLC

CERTIFICATE OF SERVICE - MAIL, OTHER

I hereby certify that on the 24th day of August, 2015, I caused to be served a true and correct copy of the foregoing to be served as follows:

By Notice of Electronic Filing (CM/ECF)

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Mail Service to Entire Matrix - By regular first class United States mail, postage fully pre-paid, addressed as follows:

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_____/s/_____

Mail Clerk